

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION  
CASE NO. 10-11893

*ELECTRONICALLY FILED*

JOSEPH S. PROVANZANO

PLAINTIFF

v. **MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION  
AND FOR FAILURE TO STATE A CLAIM**

BRIDGET M. PARKER,  
INDIVIDUALLY AND DOING BUSINESS AS  
PARKER VIEW FARM,  
PARKER VIEW FARM, INC.,  
ROBERT M. TURNER,  
INDIVIDUALLY AND DOING BUSINESS AS  
LM TURNER STABLES, AND  
LM TURNER STABLES, INC.,

DEFENDANTS

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Defendants Bridget M. Parker, Parker View Farms, Inc., Robert M. Turner and LM  
Turner Stable (“Defendants”), by and through counsel, move the Court to dismiss the present  
lawsuit because: 1) there is a similar action pending in Woodford County, Kentucky, 2) the  
Court lacks personal jurisdiction over Defendants, and 3) Plaintiff has failed to state a claim  
upon which relief can be granted. A memorandum of law is attached hereto that more fully  
analyzes the arguments supporting dismissal.

The undersigned’s law firm has conferred with Plaintiff’s counsel and attempted in good  
faith to resolve or narrow the issue to no avail.

Respectfully submitted,

/s/Michael J. Mott  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Motion was served electronically with the Clerk of the Court by using the CM/ECF system on this the 11<sup>th</sup> day of November, 2010 upon all parties of record.

/s/Michael J. Mott  
*Counsel for Defendants*